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September 19, 2022

Hon. Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, NY 10007

Re: United States v. Franzone
21 CR 446 (VSB)

Dear Judge Broderick,

We represent Defendant Andrew Franzone ("Franzone") in the above-captioned case. We write to request permission for Mr. Franzone to travel to Florida later this week to meet with local counsel.

Mr. Franzone would travel to Florida on Wednesday, September 21, 2022 and return to New York on Sunday, September 25, 2022.

We have conferred with the Government, and have been advised that the Government has no objection, providing that Pretrial Services also has no objection.

We have also reached out to Pretrial Services, and have been advised that Pretrial Services has no objection to this request. Pretrial Services has been sent an anticipated itinerary. Should the application be granted, Mr. Franzone will confirm the flight times for Pretrial Services.

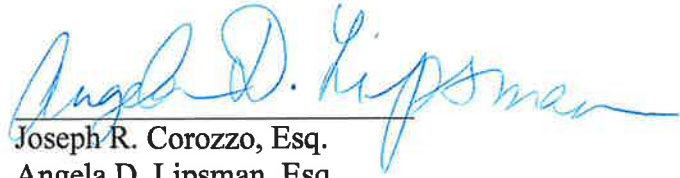
We note that the Court granted Mr. Franzone's last two applications to travel. Orders, ECF # 29 and ECF # 43.

Wherefore, we respectfully request that Mr. Franzone be permitted to travel to Florida from Wednesday, September 21, 2022 until Sunday, September 25, 2022.

RUBINSTEIN & COROZZO, LLP

Thank you for your consideration.

Respectfully submitted,



Joseph R. Corozzo, Esq.
Angela D. Lipsman, Esq

cc: AUSAs Alexander Rossmiller and Kiersten Fletcher (via ECF)
Pretrial Services Officer Jazzlyn Harris (via email)